

**UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO**

In re:

The Financial Oversight and Management Board  
for Puerto Rico,

as representative of

The Commonwealth of Puerto Rico, et al.

Debtors.

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

In re:

The Financial Oversight and Management Board  
for Puerto Rico,

as representative of

The Employees Retirement System of the  
Government of the Commonwealth of Puerto  
Rico (ERE),

Debtor.

PROMESA

Title III

No. 17 BK 3566-LTS

(Joint Administration Requested)

In re:

The Financial Oversight and Management Board  
for Puerto Rico,

as representative of

Puerto Rico Highways & Transportation  
Authority,

Debtor.

PROMESA

Title III

No. 17 BK 3567-LTS

(Joint Administration Requested)

**INFORMATIVE MOTION OF THE COFINA SENIOR BONDHOLDERS'  
COALITION REGARDING ITS REQUEST TO BE HEARD  
AT THE JUNE 28-29, 2017 OMNIBUS HEARING**

**TO THE HONORABLE COURT:**

**PLEASE TAKE NOTICE** that on June 6, 2017, the Court entered the First Amended Case Management Procedures (the “Case Management Procedures”) (Dkt. 262-1). The Case Management Procedures provide for the periodic scheduling of omnibus hearings, and scheduled the next omnibus hearing for June 28-29, 2017 (the “June 28-29 Hearing”).

**PLEASE TAKE FURTHER NOTICE** that the following motions, among others, are scheduled to be heard at the June 28-29 Hearing:

- Motion for Relief from the Automatic Stay filed by Puerto Rico Funds and the Mutual Fund Group filed on June 7, 2017 (Dkt. No. 270 in Case No. 17-3283; Dkt No. 139 in Case No. 3284) (the “Lift Stay Motion”) (Agenda Item III.4).
- Motion of Debtors Pursuant to PROMESA Section 301(A) and Bankruptcy Code Sections 105(A), 362(A), 365, and 922 for Entry of Order Confirming (I) Application of the Automatic Stay to Government Officers, Agents, and Representatives (II) Stay of Prepetition Lawsuits and Actions Against Inhabitants of Puerto Rico (III) Application of Contract Protections filed on June 9, 2017 (Dkt. No. 301) (the “Application of the Automatic Stay Motion”) (Agenda Item III.3).
- Motion of Debtors for an Order Approving Procedure to Resolve the Commonwealth-COFINA Dispute filed on June 9, 2017 (Dkt. No. 303) (the “Protocol Motion”) (Agenda Item III.5).

**PLEASE TAKE FURTHER NOTICE** that the COFINA Senior Bondholders’ Coalition<sup>1</sup> responded to these motions as follows:

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<sup>1</sup> The COFINA Senior Bondholders’ Coalition includes José F. Rodríguez Perelló and the following institutional holders of the COFINA senior bonds: Aristeia Horizons, L.P.;

- On June 21, 2017, the COFINA Senior Bondholders' Coalition filed an Objection (Dkt. No. 406 in Case No. 17-3283; Dkt No. 168 in Case No. 3284) (the "Lift Stay Objection") to the Lift Stay Motion.
- On June 16, 2017, the COFINA Senior Bondholders' Coalition filed an Objection (Dkt. No. 371) (the "Application of the Automatic Stay Objection") to the Application of the Automatic Stay Motion.
- On June 16, 2017, the COFINA Senior Bondholders' Coalition filed an Objection (Dkt. No. 374) (the "Protocol Objection") to the Protocol Motion.

**PLEASE TAKE FURTHER NOTICE** that on June 15, 2017, the Oversight Board filed Debtors' Status Report Regarding (A) Financial Disclosures to Creditors and (B) Status of Settlement Discussions (Dkt. 350) (the "Status Report"), and that on June 26, 2017, the COFINA Senior Bondholders' Coalition filed a Statement in response to the Debtors' Status Report (Dkt. No. 464).

**PLEASE TAKE FURTHER NOTICE** that on June 21, 2017, the Court entered the Order Regarding Procedures for Attendance, Participation and Observation of June 28-29, 2017,

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Camino Cipres LLC; Camino Roble LLC; Canary SC Master Fund, L.P.; Canyon Capital Advisors LLC (on behalf of its participating clients); River Canyon Fund Management LLC (on behalf of its participating clients); Crescent 1, L.P.; CRS Master Fund, L.P.; Cyrus Opportunities Master Fund II, Ltd.; Cyrus Select Opportunities Master Fund, Ltd.; Cyrus Special Strategies Master Fund, L.P.; Decagon Holdings 1, L.L.C.; Decagon Holdings 2, L.L.C.; Decagon Holdings 3, L.L.C.; Decagon Holdings 4, L.L.C.; Decagon Holdings 5, L.L.C.; Decagon Holdings 6, L.L.C.; Decagon Holdings 7, L.L.C.; Decagon Holdings 8, L.L.C.; Decagon Holdings 9, L.L.C.; Decagon Holdings 10, L.L.C.; Merced Partners Limited Partnership; Merced Partners IV, L.P.; Merced Partners V, L.P.; Pandora Select Partners, L.P.; SB Special Situation Master Fund SPC, Segregated Portfolio D; Scoggin International Fund Ltd.; Scoggin Worldwide Fund Ltd.; Taconic Master Fund 1.5 L.P.; Taconic Opportunity Master Fund L.P.; Tilden Park Investment Master Fund LP; Värde Credit Partners Master, L.P.; Värde Investment Partners, L.P.; Värde Investment Partners (Offshore) Master, L.P.; The Värde Skyway Master Fund, L.P.; Whitebox Asymmetric Partners, L.P.; Whitebox Institutional Partners, L.P.; Whitebox Multi-Strategy Partners, L.P.; and Whitebox Term Credit Fund I L.P.

Omnibus Hearing (Dkt. No. 403) (the “Order”). The COFINA Senior Bondholders’ Coalition submits this informative motion in response to the Order.

**PLEASE TAKE FURTHER NOTICE** that Susheel Kirpalani of Quinn Emanuel Urquhart & Sullivan, LLP, co-counsel for the COFINA Senior Bondholders’ Coalition, requests to be heard at the June 28-29 Hearing regarding the Lift Stay Motion (Agenda Item III.4), the Application of the Automatic Stay Motion (Agenda Item III.3), the Protocol Motion (Agenda Item III.5), and the Status Report to the extent it is a topic of discussion at the June 28-29 Hearing. Mr. Kirpalani will appear in Courtroom 2 of the United States District Court for the District of Puerto Rico.

DATED: June 26, 2017

Respectfully submitted,

REICHARD & ESCALERA

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Co-Counsel to the COFINA Senior Bondholders' Coalition

**CERTIFICATE OF SERVICE**

I hereby certify that on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel for the parties of record.

/s/ Carlos R. Rivera-Ortiz  
USDC-PR 303409